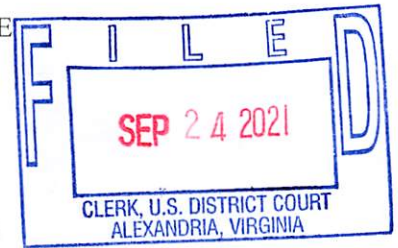


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION



IN RE: APPLICATION OF THE UNITED)
STATES OF AMERICA FOR ORDER)
PURSUANT TO 18 U.S.C. § 2703(D))

UNDER SEAL

CASE NO. 1:20-DM-00012 (AJT)

**CONSENT MOTION TO EXTEND TIME TO RESPOND TO
WARNER MEDIA'S MOTION FOR UNSEALING REMAINING DOCUMENTS**

On August 27, 2021, Warner Media LLC filed a pleading requesting this Court to unseal the remaining records that were previously filed under seal in 2020 in the proceedings related to the above-captioned case (the "Motion"). This Court later entered an order extending the government's response date to September 27, 2021.

With the consent of Warner Media, LLC ("Warner Media"), the government respectfully moves this Court to extend its response deadline to November 24, 2021. The government requests this extension because it needs additional time, assuming *arguendo* that it agrees to release additional information, to determine the scope of any additional releases and to consult with relevant equity holders within the U.S. Department of Justice and other government agencies. As noted above, the government has conferred with counsel for Warner Media and they do not object to the requested extension.

CONCLUSION

For the foregoing reasons, the government requests that the Court extend the deadline to respond to Warner Media's Motion to November 24, 2021.

Dated: September 24, 2021

MARK J. LESKO
Acting Assistant Attorney General
National Security Division
United States Department of Justice

Respectfully submitted,

RAJ PAREKH
Acting United States Attorney

Gordon Kromberg For David Lim

David Lim
Trial Attorney
National Security Division, DOJ
Virginia Bar No. 99999
Attorney for the United States
950 Pennsylvania Ave., NW
Washington, DC 20530
(202) 598-3449
David.Lim2@usdoj.gov

Digitally signed
by Gordon D.
Kromberg
Date: 2021.09.24
16:01:31 -04'00'

Gordon D. Kromberg
Assistant United States Attorney
Virginia Bar No. 33676
Attorney for the United States
2100 Jamieson Avenue
Alexandria, VA 22314
(703) 299-3700
(703) 837.8242 (fax)
gordon.kromberg@usdoj.gov

Certificate of Service

I hereby certify that on September 24, 2021, I transmitted the foregoing **CONSENT MOTION TO EXTEND TIME TO RESPOND TO WARNER MEDIA'S MOTION TO UNSEAL REMAINING DOCUMENTS** by email to below listed counsel of record:

Brittany Amadi at Brittany.amadi@wilmerhale.com
Aaron Zebley at aaron.zebley@wilmerhale.com
Whitney Russell at whitney.russell@wilmerhale.com

Digitally signed by
Gordon D. Kromberg
Date: 2021.09.24
16:01:52 -04'00'

Gordon D. Kromberg
Assistant United States Attorney
Virginia Bar No. 33676
Assistant United States Attorney
Attorney for the United States
2100 Jamieson Avenue
Alexandria, VA 22314
(703) 299-3700
(703) 837.8242 (fax)
gordon.kromberg@usdoj.gov